

UNITED STATES DISTRICT COURT

for the

# Eastern District of Wisconsin

In the Matter of the Search of

(Briefly describe the property to be searched  
or identify the person by name and address)

Devices A-E, currently in law enforcement possession, as further described in Attachment A

Case No.23-843M(NJ)

## WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search and seizure of the following person or property located in the Eastern District of Wisconsin  
(identify the person or describe the property to be searched and give its location):

See Attachment A.

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property described above, and that such search will reveal (*identify the person or describe the property to be seized*):

See Attachment B.

**YOU ARE COMMANDED** to execute this warrant on or before 2/3/2023 *(not to exceed 14 days)*

☐ in the daytime 6:00 a.m. to 10:00 p.m. ☒ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required by law and promptly return this warrant and inventory to Hon. Nancy Joseph

(United States Magistrate Judge)


☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C. § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose property, will be searched or seized (*check the appropriate box*)

☐ for days (not to exceed 30) ☐ until, the facts justifying the later specific date of .

Date and time issued: 1/20/2023 @ 3:44 p.m.

City and state: Milwaukee, Wisconsin

ing the later specific date of \_\_\_\_\_

  
\_\_\_\_\_  
Judge's signature

*Judge's signature*

Honorable Nancy Joseph, U.S. Magistrate Judge

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*Printed name and title*

<b>Return</b>		
Case No.:	Date and time warrant executed:	Copy of warrant and inventory left with:
Inventory made in the presence of :		
Inventory of the property taken and name(s) of any person(s) seized:		
<b>Certification</b>		
<p>I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the designated judge.</p> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> <p>Date: _____</p> </div> <div style="width: 60%;"> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Executing officer's signature</i></p> <p style="text-align: center;">_____</p> <p style="text-align: center;"><i>Printed name and title</i></p> </div> </div>		

## **ATTACHMENT A**

### **Property to Be Searched**

1. The property to be searched are the five cellular phones, more fully described as the following, hereinafter referred as the “Devices”:

- a. a dark black Samsung located cell phone located on January 11, 2023, on top of a nightstand at BROOKSHIRE’s residence of XX254 West Cowpath, Maricopa, AZ, in evidence under West Allis Police Department Inventory No. 23-000217, Item No. 1 (“Device A”);
- b. a black Nokia flip style cell phone located on January 11, 2023, in the drawer of a nightstand at BROOKSHIRE’s residence of XX254 West Cowpath, Maricopa, AZ, currently in evidence under West Allis Police Department Inventory No. 23-000217, Item No. 2 (“Device B”);
- c. a Motorola cell phone with cracked screen located on January 11, 2023, on top of a nightstand at BROOKSHIRE’s residence of XX254 West Cowpath, Maricopa, AZ, in evidence under West Allis Police Department Inventory No. 23-000217, Item No. 3 (“Device C”);
- d. a green Apple I Phone with pink protective case located on January 11, 2023, during the arrest of Brittany Brewer, currently in evidence under Milwaukee Police Department Inventory No. 23001793, Item No. 2 (“Device D”); and
- e. an Apple I Phone with diamond studded protective case, located on January 13, 2023, during the arrest of BREWER, currently in evidence under West Allis Police Department Inventory No. 23-000219, Item No. 1 (“Device E”).

2. Device A, Device B, Device C, and Device E are currently stored at the West Allis Police Department, located at 11301 West Lincoln Avenue, West Allis, Wisconsin and Device D is currently stored at the HIDTA office, located at 801 West Michigan Street, Milwaukee, Wisconsin.

3. The applied-for warrant would authorize the forensic examination of the Devices for the purpose of identifying electronically stored data particularly described in Attachment B.

**ATTACHMENT B**  
**Particular Things to be Seized**

1 All records and information on the Devices described in Attachment A that relate to a violation of Conspiracy to Distribute and Conspiracy to Possess with Intent to Distribute, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance, in violation of Title 21, United States Code Sections 843(b), including:

- a. Preparatory steps taken in furtherance of this crime;
  - b. Any audio, video, and/or photograph(s) files on the phone of criminal activity or of evidentiary value;
  - c. All voicemail and call records;
  - d. All text messages and call history;
  - e. Contact list, to include names, addresses, phone numbers, and/or email addresses;
  - f. All social media sites used and applications for social media sites;
  - g. All internet activity;
  - h. All location data including from the phone and/or from any downloaded applications;
2. Evidence of user attribution showing who used or owned the Devices at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history;
3. Records evidencing the use of the Internet Protocol address to communicate, including:
- a. records of Internet Protocol addresses used;

- b. records of Internet activity, including firewall logs, caches, browser history and cookies, “bookmarked” or “favorite” web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.

## UNITED STATES DISTRICT COURT

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Eastern District of Wisconsin

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

Case  
No.23-843M(NJ)

Devices A-E, currently in law enforcement  
possession, as further described in Attachment A

## APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A.

located in the \_\_\_\_\_ Eastern \_\_\_\_\_ District of \_\_\_\_\_ Wisconsin \_\_\_\_\_, there is now concealed (identify the person or describe the property to be seized):

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;  
☐ contraband, fruits of crime, or other items illegally possessed;  
☐ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

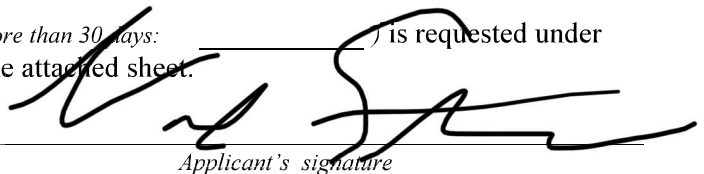
Code Section	Offense Description
21 U.S.C. §§§ 841(a)(1); 846; & 843	Distribution of controlled substances; Conspiracy to distribute controlled substances; Unlawful Use of a communication facility to facilitate the distribution of a controlled substances.

The application is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



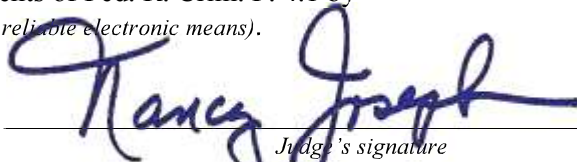
Applicant's signature

DEA TFO Nick Stachula

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by  
\_\_\_\_\_ telephone \_\_\_\_\_ (specify reliable electronic means).

Date: 1/20/2023



Judge's signature

City and state: Milwaukee, Wisconsin

Honorable Nancy Joseph, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEARCH WARRANT**

I, Nick Stachula, being first duly sworn, hereby depose and state as follows:

**I. INTRODUCTION AND AGENT BACKGROUND**

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the examination of property—electronic devices—which are currently in law enforcement possession, and the extraction from that property of electronically stored information described in Attachment B.

2. I am a Task Force Officer with the Drug Enforcement Administration (DEA) and have been so since January 2017. I am also a Detective with the West Allis Police Department and have been so employed since November 2000.

3. As a part of my duties, I investigate criminal violations relating to narcotics trafficking offenses, including violations of Title 21, United States Code, Sections 841, 843, and 846, and federal firearms offenses, including violations of Title 18, United States Code, Sections 922(g), 924(a), and 924(c). In the course of my experience, I have and continue to be involved in investigations of criminal offenses and have assisted with search warrants for items related to gang investigations, organized crime, violent crime, firearms offenses, drug trafficking, thefts, counterfeit crimes, forgeries, including cellular telephones and other electronic telecommunication devices.

4. I have had formal training in the investigation of drug trafficking. I have worked with numerous informants in the investigation of drug trafficking. I have participated in the execution of numerous search warrants in which controlled substances, firearms, drug paraphernalia, and counterfeit monies were seized.

5. I know drug traffickers often use electronic devices, such as telephones, cellular devices, computers, and currency counting machines to generate, transfer, count, record, or store the information described above and conduct drug trafficking and money laundering. I am familiar with computers, cellular devices, pagers, and other electronic media or electronic storage devices and their uses by drug traffickers to communicate with suppliers, customers, co-conspirators, and fellow traffickers. These devices often contain evidence of illegal activities in the form of communication records, voicemail, email, text messages, video and audio clips, location information, business records, and transaction records. I know drug traffickers take, store, preserve, or maintain photographs or videos of themselves, their associates, their property, their drugs, and their drug proceeds. These traffickers usually maintain these photographs or videos on computers, cellular devices, and other electronic media or electronic storage devices. Based upon my training and experience, I know that cellular devices may be important to a criminal investigation in two distinct and important respects: (1) the objects themselves may be instrumentalities, fruits, or evidence of crime; and (2) the objects may have been used to collect and store information about crimes. I have participated in numerous drug trafficking investigations involving the seizure of computers, cellular phones, cameras, and other digital storage devices, and the subsequent analysis of electronic data stored within these devices. This has led to evidence of the crimes under investigation and corroborated information already known or suspected by law enforcement. I have regularly used electronic evidence to find proof relating to the commission of criminal offenses, including intent, motive, manner, means, and the identity of suspects and conspirators.



6. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, in that I am empowered by law to conduct investigations of and to make arrests for federal felony offenses.

7. This affidavit is based upon my personal knowledge and upon information provided to me by other federal, state, and local law enforcement officers during the course of their official duties. Throughout this affidavit, I refer to case agents. Case agents are those federal, state, and local law enforcement officers who have directly participated in this investigation, and with whom I have had regular contact regarding this investigation.

8. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

9. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that offenses of Conspiracy to Distribute and Conspiracy to Possess with Intent to Distribute, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance, in violation of Title 21, United States Code Sections 843(b), has been committed by Leonard BROOKSHIRE (DOB XX/XX/1978), Yvonne M. ECHOLS (DOB XX/XX/1979) and Brittany BREWER (DOB XX/XX/1991), and other unknown suspects. There is also probable cause to search the information described in Attachment A for evidence of these crimes further described in Attachment B.

## **II. IDENTIFICATION OF DEVICES TO BE EXAMINED**

10. The property to be searched are the five cellular phones, more fully described as the following, hereinafter referred as the "Devices":

- a. a dark black Samsung located cell phone located on January 11, 2023, on top of a nightstand at BROOKSHIRE's residence of XX254 West Cowpath,

Maricopa, AZ, in evidence under West Allis Police Department Inventory No. 23-000217, Item No. 1 (“Device A”);

- b. a black Nokia flip style cell phone located on January 11, 2023, in the drawer of a nightstand at BROOKSHIRE’s residence of XX254 West Cowpath, Maricopa, AZ, currently in evidence under West Allis Police Department Inventory No. 23-000217, Item No. 2 (“Device B”);
- c. a Motorola cell phone with cracked screen located on January 11, 2023, on top of a nightstand at BROOKSHIRE’s residence of XX254 West Cowpath, Maricopa, AZ, in evidence under West Allis Police Department Inventory No. 23-000217, Item No. 3 (“Device C”);
- d. a green Apple I Phone with pink protective case located on January 11, 2023, during the arrest of Brittany Brewer, currently in evidence under Milwaukee Police Department Inventory No. 23001793, Item No. 2 (“Device D”); and
- e. an Apple I Phone with diamond studded protective case, located on January 13, 2023, during the arrest of BREWER, currently in evidence under West Allis Police Department Inventory No. 23-000219, Item No. 1 (“Device E”).

11. Device A, Device B, Device C, and Device E are currently stored at the West Allis Police Department, located at 11301 West Lincoln Avenue, West Allis, Wisconsin and Device D is currently stored at the HIDTA office, located at 801 West Michigan Street, Milwaukee, Wisconsin.

12. The applied-for warrant would authorize the forensic examination of the Devices for the purpose of identifying electronically stored data particularly described in Attachment B.

### **III. PROBABLE CAUSE**

#### **A. Identified of the BROOKSHIRE Drug Trafficking Organization and Parcels Associated**

##### **a. Subject Parcel 1**

9. On July 21, 2022, the High Intensity Drug Trafficking Area Drug Gang Task Force, initiated a drug investigation involving the trafficking of fentanyl from Chandler, Arizona to the West Allis, Wisconsin via the United States Postal Service (USPS). As a result of this investigation the United States Postal Inspection Service (USPIS) were monitoring parcels from Phoenix, Arizona and the surrounding zip codes being sent to the Milwaukee Metropolitan Area.

10. In September 2022 USPIS located a suspicious parcel with USPS Priority Mail Express parcel number EI387224872US (Subject Parcel 1) suspected to be linked to an on-going fentanyl investigation where fentanyl pills were being mailed via USPS from Chandler, Arizona to West Allis, Wisconsin. USPIS advised that the parcel was a Priority Mail Express from “Richard Larcy” of XX35 South 38<sup>th</sup> LN, Phoenix, AZ 85041 to “Mr. Boykin” at XX16 North 14<sup>th</sup> Street Milwaukee, WI 53209. The parcel was scheduled to be delivered on September 16, 2022. USPIS located an Internet Protocol (IP) address of 216.9.178.191 by Orbitel Communications related to Subject Parcel 1.

11. USPIS noted that after an arrest by case agents in the Chandler, Arizona fentanyl pill investigation on July 21, 2022 the addresses XX25 North 91<sup>st</sup> Street. Milwaukee, WI, XX33 East Pleasant Street, # 207 Milwaukee, WI, and XX16 North 14<sup>th</sup> Street Milwaukee, WI consistently started receiving USPS parcels from the Phoenix, Arizona area. The parcels were being received on a weekly basis since August of 2022. Case agents were aware that the Chandler, Arizona source of fentanyl pills was alerted to an arrest of the West Allis co-conspirator in that investigation, so initially case agents believed these parcels might be related.

12. On September 16, 2022, at approximately 11:11 a.m. case agents delivered the Subject Parcel 1 to the address of XX16 North 14<sup>th</sup> Street Milwaukee, WI 53209. Case agents were in the area and conducted surveillance on the USPS Priority Mail Express parcel delivered to XX16 North 14<sup>th</sup> Street Milwaukee, WI 53209. At approximately 11:25 a.m. case agents observed a black 2010 Chevrolet Traverse bearing Wisconsin license plate AMW-2924 (Traverse). Case agents reviewed Department of Transportation (DOT) records and learned the Traverse was registered to Jamesha D. CRAWFORD (DOB XX/XX/1990) of XX56 North 14<sup>th</sup> Street, Milwaukee, WI, 0.2 miles south of the delivery location of XX16 North 14<sup>th</sup> Street, Milwaukee, WI. The Traverse

pulled up and parked in front of XX16 North 14<sup>th</sup> Street, Milwaukee, WI. Case agents observed a female, later determined to be CRAWFORD through DOT records, exit the driver seat, walk up to the front porch and retrieve the Subject Parcel 1. CRAWFORD was on her cell phone and appeared to be reading the parcel label to someone on the cell phone (Figure 1). CRAWFORD was ultimately followed back to her residence of XX56 North 14<sup>th</sup> Street, Milwaukee, WI with Subject Parcel 1.



(Figure 1)

13. USPIS obtained video surveillance footage from September 15, 2022, of USPS Laveen, Arizona Office related to the mailing of Subject Parcel 1. The sender of the USPS Subject Parcel 1 was later identified as Leonard BROOKSHIRE (DOB XX/XX/1978) through DOT photo (Figure 2).



(Figure 2)

**b. Subject Parcel 2**

14. On September 29, 2022, information was obtained from USPIS that a USPS parcel with tracking number 9505511037712271424604 was sent from Cashion, Arizona to the XX50A North 28<sup>th</sup> Street, Milwaukee, WI (Subject Parcel 2). The IP address of 216.9.178.191 was checking Subject Parcel 2. This is the same IP address used in Subject Parcel 1, which was mailed to XX16 North 14<sup>th</sup> Street Milwaukee, WI 53209 on September 16, 2022. In addition, IP address 108.76.222.210 and 2600.1700:b0d0:2e90: was also being used to check the mailing of Subject Parcel 2.

15. Subject Parcel 2 had a handwritten label addressed from “Brayan Ramirez” XX35 West Clarendon Avenue, Phoenix, AZ 85015. The handwritten label is addressed to “Mr. Boykin” XX50A North 28th Street (upper), Milwaukee, WI 53216 (Figure 3).



(Figure 3)

16. On September 29, 2022, at approximately 10:00 a.m., case agents observed a grey Chevrolet Malibu with Wisconsin license plate ANN-2542 (Malibu) parked in front of XX50A North 28<sup>th</sup> Street. Case agents reviewed DOT records and determined the Malibu was registered to Kevin J. Pulley (DOB XX/XX/1988) of XX50 North 28<sup>th</sup> Street, Milwaukee, WI, the same

address but for the “A” Subject Parcel 2 was mailed to. Case agents reviewed law enforcement databases which indicated Pulley has a criminal history which includes narcotics, cocaine and marijuana, and firearm offenses. Case agents also reviewed records which indicated Anthony Greenlee with cell phone 402-880-3706 had a WE Energy account for the address of XX50A North 28<sup>th</sup> Street, Milwaukee, WI since February 1, 2022.

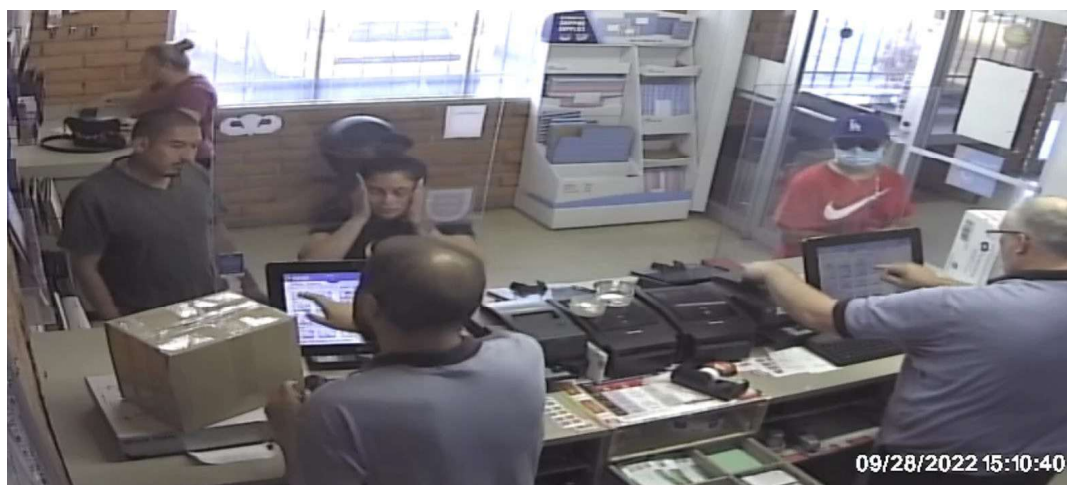
17. On September 30, 2022, Magistrate Judge William E. Duffin authorized a federal search warrant of Subject Parcel 2. Case agents executed the search warrant at the West Allis Police Department. Inside Subject Parcel 2 was a separate brown cardboard box with a “Duralast” brake pad sticker affixed to it. Inside of the brown cardboard box was old brake pads and another black and yellow “Duralast Gold” cardboard box. Inside this box was hard “brick-like” substance wrapped inside of saran wrap. Subject Parcel 2 has “RR” written on the inner wrapping. The size of the substance was consistent to a kilogram amount of controlled substances. Investigators peeled off multiple layers of saran wrap and observed some of the saran wrap was layered in oil/grease. Based on my training experience, drug traffickers will often place substances within the narcotics in order to avoid any law enforcement canine detection. . Once the layers were removed, case agents found a brick of a white substance with a number eight pressed into the brick. Case agents used the “TruNarc” narcotics testing device on the white substance from Subject Parcel 2, which indicated the substance as being fentanyl and weighed with the result of approximately one kilogram (Figure 4).



(Figure 4)

18. Subject Parcel 2 was being mailed to XX50A N. 28th St. Milwaukee, WI, but had the same fictitious recipient listed as "Mr. Boykin" as Subject Parcel 1. During the prior surveillance on September 16, 2022, CRAWFORD was identified as the person who took possession of Subject Parcel 1 from the front of XX16 North 14<sup>th</sup> Street, Milwaukee, WI 53209.

19. USPIS Inspectors obtained video surveillance from the USPS located in Cashion, Arizona where Subject Parcel 2 was mailed. The video depicted a Hispanic male and female shipping Subject Parcel 2 to XX50A North 28<sup>th</sup> Street (upper), Milwaukee, WI 53216 (Figure 5).



(Figure 5)



20. On October 4, 2022, case agents served a subpoena to Orbitel Communications pertaining to the IP address of 216.9.178.191, which was used in the mailing of Subject Parcel 1 and Subject Parcel 2. The 216.9.178.191 IP address had the customer identified as “Leonard BROOKSHIRE” at XX254 West Cowpath Road, Maricopa AZ 85138 and telephone number 406-261-2119.

**c. Subject Parcel 3**

21. On October 12, 2022, Magistrate Judge Stephen C. Dries authorized a GPS tracking search warrant to be applied on a CRAWFORD’s Traverse, which she used to pick up Subject Parcel 1.

22. On October 13, 2022, case agents executed the search warrant and installed the GPS device on the Traverse while it was parked in the alley directly behind her residence of XX56 North 14<sup>th</sup> Street Milwaukee, Wisconsin. GPS data collected from this warrant, was consistent with CRAWFORD’s involvement with the DTO.

23. USPIS continued to monitor data related to USPS parcels suspected to be related to this investigation. USPIS located parcels shipped by the BROOKSHIRE drug trafficking organization (DTO) that were delivered and not intercepted by law enforcement.

24. On October 12, 2022, at 1:37 p.m. parcel with tracking number 9570110579172285481848 (Subject Parcel 3) was mailed from Phoenix, Arizona to the same address Subject Parcel 1 was mailed, XX16 North 14<sup>th</sup> Street, Milwaukee, WI. Subject Parcel 3 weighed three ounces and the sender paid \$39.10 to mail the parcel. BROOKSHIRE’s IP address of 216.9.178.191 was used to track the mailing of Subject Parcel 3. Subject Parcel 3 was delivered on October 13, 2022, at 11:57 a.m. GPS data from CRAWFORD’s Traverse indicated it arrived and stopped at the address of XX16 North 14<sup>th</sup> Street, Milwaukee, WI on October 13, 2022, at



11:58 a.m., one minute after Subject Parcel 3 was delivered, and then departed the area.

**d. Subject Parcel 4 - Arrest of Jacque S. HERNANDEZ**

25. On October 15, 2022, USPS seized parcel number 9570113639812287174011 (Subject Parcel 4) shipped from a USPS Office in Maricopa, Arizona and addressed to "Willie Boykin" of XX33 East Pleasant Street, Apt207 Milwaukee, WI 53202. (Figure 6). A federal search warrant, authorized by Magistrate Judge Stephen C. Dries, was obtained and executed on Subject Parcel 4.



(Figure 6)

26. Inside Subject Parcel 4 was an additional USPS box that contained Styrofoam and paper packaging and two white Nike t-shirts. The two white Nike t-shirts contained a Tupperware container, which was wrapped in cellophane. Inside the Tupperware container were five individual plastic baggies, which contained fraudulent prescription M-30's (blue circular pills), which tested positive for the presence of fentanyl. Case agents believe there to be approximately 1,000 doses per baggie and in total the fentanyl weighed approximately 566 grams (Figure 7).



(Figure 7)

27. The recipient of the Subject Parcel 4 was identified as Jacque S. HERNANDEZ (DOB XX/XX/1978) at XX33 East Pleasant Street, Apt 207, Milwaukee, WI. Case agents also observed BROOKSHIRE's IP address of 216.9.178.191 way used to track the mailing of Subject Parcel 4. Case agents also observed an additional IP address of 2600:1700:b0d0:2e90: was being used during the mailing of Subject Parcel 4.

28. On October 15, 2022, case agents removed the fentanyl from Subject Parcel 4 and Subject Parcel 4 was delivered to XX33 East Pleasant Street, Milwaukee, Wisconsin. HERNANDEZ accepted the parcel and was arrested by case agents. HERNANDEZ provided consent to search his apartment and cell phone and ultimately identified BROOKSHIRE as the source of fentanyl from Arizona.

29. Case agents conducted a Mirandized interview with HERNANDEZ. HERNANDEZ identified BROOKSHIRE as his High School friend. He advised that BROOKSHIRE resides in Arizona and is the person who is sending him the USPS parcels. HERNANDEZ confirmed that BROOKSHIRE was the person who sent him Subject Parcel 4 and BROOKSHIRE calling HERNANDEZ with the contact title of "Vee" with the Arizona area code.

30. HERNANDEZ advised he received three prior USPS parcels from BROOKSHIRE over the past few months. HERNANDEZ denied opening any of the USPS parcels. HERNANDEZ

said that he would be contacted by BROOKSHIRE after the USPS parcel was delivered to his apartment and BROOKSHIRE give HERNANDEZ instructions to take the parcel to the Jetz gas station located at XX25 North Farwell Avenue, Milwaukee, WI. Once there, HERNANDEZ picked up an envelope with money behind the dumpster and left the parcel.

31. HERNANDEZ denied knowing who picked up the parcels. He recalled that during the delivery of one prior parcel, he met an unknown black male with dreads, wearing a face mask and driving a black Chevrolet SUV, possible a Traverse, at Tina's corner store located at XX18 North Franklin Street, Milwaukee, WI. HERNANDEZ stated that he was paid \$200 for receiving and dropping off the parcels for BROOKSHIRE. HERNANDEZ admitted that this type of activity was consistent with something illegal being inside the USPS parcels. However, HERNANDEZ denied knowing what was actually inside the parcels. HERNANDEZ said that he assumed it was marijuana. Case agents advised HERNANDEZ that the size of the parcels and the amount of trouble having these parcels delivered was not consistent with marijuana. Case agents advised HERNANDEZ that the USPS parcels contained large amounts of fentanyl. HERNANDEZ appeared to be upset by this and denied having any knowledge that the USPS parcels contained fentanyl.

32. HERNANDEZ provided verbal/written consent to search his cell phone and provided his passcode. HERNANDEZ confirmed that the contact's name of "Vee" having telephone number 406-261-2119 was the cell phone number for BROOKSHIRE. Case agents extracted the call logs between HERNANDEZ's number 414-581-8037 and BROOKSHIRE's number 406-261-2119. Case agents located 95 contacts with each other between September 23, 2021, and October 15, 2022, and text message strings showing 168 instant messages between August 25, 2021, and October 15, 2022.

33. The following is an excerpt of some instant messaging between HERNANDEZ and BROOKSHIRE:

July 6, 2022

BROOKSHIRE: Hit me when u get a chance

HERNANDEZ: 1133 East Pleasant Street 53202 Apt 207

HERNANDEZ: OK

July 8, 2022

BROOKSHIRE: Ok hit you in 20mins

BROOKSHIRE: Let me know when u want me to send buddy to see you

HERNANDEZ: Let buddy know everything smooth

BROOKSHIRE: I talked to him all good

BROOKSHIRE: I'm happy for you bro!!! Love y'all

August 2, 2022

HERNANDEZ: Call me when you get a chance

August 3, 2022

BROOKSHIRE: I need u again lmk if wanna catch \$150

BROOKSHIRE: Hit u in 30mins bro

August 6, 2022

HERNANDEZ: Call when you get up

BROOKSHIRE: 2918 w oriole (**TARGET LOCATION**)

September 1, 2022

HERNANDEZ: Call me ASAP. Bidness. Im going to sleep in a few wanted to run something past you

September 2, 2022

HERNANDEZ: A man What happened with the whatchamacallit

BROOKSHIRE: 414-275-3990 Darkness

BROOKSHIRE: Big homie I'm on my way there I know it's short notice but can I use the room? LMK asap!

34. On October 15, 2022, at 11:12 a.m., prior to the arrest of HERNANDEZ, there was a 23 minute 11 second outgoing call and a 10 second answered call at 11:35 a.m. between HERNANDEZ and BROOKSHIRE's cell phone 406-261-2119. On October 15, 2022, between 11:35 a.m. and 4:48 p.m., BROOKSHIRE's cell phone 406-261-2119 called HERNANDEZ ten times, after the arrest of HERNANDEZ.

35. On October 17, 2022, at approximately 12:25 p.m. under the direction of case agents, HERNANDEZ agreed to place a one-party consent phone call to BROOKSHIRE using cell phone 406-261-2119.

36. Upon HERNANDEZ calling 406-261-2119 a male party answered that HERNANDEZ later identified as BROOKSHIRE. BROOKSHIRE stated, "Yo." HERNANDEZ replied, "Yo, these mothers just let me out this morning...dog." BROOKSHIRE asked, "Ok, you went to who...?" HERNANDEZ advised BROOKSHIRE that he "just got to work...just got to work." BROOKSHIRE stated, "Alright, say no more...say no more. Everything good or what?" HERNANDEZ replied, "I just gotta see my PO (Probation Officer) Friday and see what's happening with her, other than that I don't know, wasn't no charges or nothing. They didn't..." BROOKSHIRE stated, "Ok, call me when you get off. Ummm, I'm gonna have...umm...gonna talk to um...you already know. You already good...you already know." The phone call ends. The audio was archived. HERNANDEZ confirms this was BROOKSHIRE using cellular phone 406-261-2119.

37. On October 20, 2022, case agents obtained a federal order from Magistrate Judge Stephen C. Dries for a trap and trace pen register on BROOKSHIRE's known cell phone 406-261-2119. After the trap and trace order was executed, investigators observed that BROOKSHIRE was no longer using 406-261-2119 after the one-party consent phone call placed by HERNANDEZ. Based on cell phone analysis BROOKSHIRE's new cell phone number 305-205-7451 was identified.

38. On December 7, 2022, Magistrate Judge William E. Duffin reviewed and authorized a federal search warrant for electronic surveillance of BROOKSHIRE's cell phone number 305-205-7451. On December 7, 2022, the search warrant was executed. Since the warrant

was executed the electronic surveillance for BROOKSHIRE's cell phone number 305-205-7451 is consistently located at the known address of BROOKSHIRE, XX254 West Cowpath Road, Maricopa, Arizona. XX254 West Cowpath Road, Maricopa, Arizona is also the same address where BROOKSHIRE's IP address 216.9.178.191 is registered.

**e. Subject Parcels 5**

39. On October 31, 2022, case agents were contacted by USPIS regarding information obtained that IP addresses 2600.1700:b0d0:2e90: and 108.76.222.210 were being used to track another parcel. Case agents obtained information from the USPIS that AT&T IP address 108.76.222.210 was used to track Subject Parcel 2, which contained a kilogram of fentanyl, while in transit from Arizona to Wisconsin. Further, 2600.1700:b0d0:2e90: was used to track Subject Parcel 2 also and Subject Parcel 4, which contained over a half kilogram of fentanyl pills. These IP addresses were tracking a USPS parcel number 9505512141272300655939 (Subject Parcel 5) from Arizona being mailed to X48 North 28<sup>th</sup> Street, Milwaukee, Wisconsin. Case agents believed Subject Parcel 5 to be associated with the BROOKSHIRE DTO given the IP address connection.

40. Case agents received information the USPS parcel was attempted to be picked up at the Post Office on October 29, 2022, in Milwaukee, Wisconsin by a female (Figure 8) and male (Figure 9).





(Figure 8)



(Figure 9)

41. On October 31, 2022, case agents were able to intercept Subject Parcel 5, prior to being delivered to X48 North 28<sup>th</sup> Street, Milwaukee, Wisconsin (Figure 10). Case agents associated the address of X48 North 28th Street, Milwaukee, WI with Yvonne M. ECHOLS (DOB XX/XX/1979), through DTO records.



(Figure 10)

42. Case agents reviewed law enforcement databases and public social media and learned that Yvonne ECHOLS is associated with members of the PULLEY family (Brandy PULLEY). Case agents are aware that Kevin PULLEY is associated with the seizure of Subject

Parcel 2 which contained a kilogram of fentanyl related to the BROOKSHIRE DTO. Case agents obtained a photograph of Yvonne ECHOLS and later confirmed Yvonne ECHOLS was the female (Figure 8) attempting to retrieve Subject Parcel 5 from the Milwaukee Post Office.

43. Case agents obtained a federal search warrant authorized by Magistrate Judge Stephen C. Dries. Case agents executed the search warrant on Subject Parcel 5, which contained one kilo of fentanyl, having the same RR marking as Subject Parcel 2 packaging (Figure 11). Subject Parcel 5 also had a "006" stamp. Case agents used the "TruNarc" narcotics testing device on the white substance from Subject Parcel 5, which indicated the substance as being fentanyl and weighed with the result of approximately one kilogram.



(Figure 11)

**f. Subject Parcel 6**

44. Case agents located another parcel with connections to the BROOKSHIRE DTO. On December 5, 2022, USPIS executed a federal search warrant authorized by Magistrate Judge William E. Duffin on USPS parcel 9505510579162334370753 (Subject Parcel 6). Subject Parcel 6 was coming from Phoenix, AZ to XX16 North 14<sup>th</sup> Street, Milwaukee, Wisconsin, the same address as Subject Parcel 1. BROOKSHIRE's IP address of 216.9.178.191 was used to track the mailing of Subject Parcel 6. The sender was listed as "Eugene ADAMS" of XX820 South 44th



Street, Apt 1224 Phoenix, AZ 85044 to "Courtney Adams" of XX16 North 14<sup>th</sup> Street, Milwaukee, WI 53209 (Figure 12).



(Figure 12)

45. Upon executing the search warrant, case agents located a plastic baggie containing green circular pills with the imprint K/8, fraudulent Oxycodone (Figure 13). Case agents tested the pills using Nark II #33, which tested positive for the presence of fentanyl. The total weight of the fentanyl was approximately 15 grams.



(Figure 13)

46. On December 5, 2022, Case agents coordinated with USPIS to have Subject Parcel 6 scanned into the USPS system as "delivered" to XX16 North 14<sup>th</sup> Street, Milwaukee, Wisconsin, after the USPS carrier delivered the regular mail to the surrounding neighborhood of XX16 North 14<sup>th</sup> Street, Milwaukee, Wisconsin. Case agents set up surveillance around the residence of XX16

North 14<sup>th</sup> Street, Milwaukee, Wisconsin.

47. At approximately 10:28 a.m. the USPS carrier delivered the mail to the address of XX16 North 14<sup>th</sup> Street, Milwaukee, Wisconsin and continued with his mail route. At approximately 10:30 a.m. USPIS entered the Subject Parcel 6 as being delivered in the USPS database. At approximately 10:53 a.m. USPIS advised that BROOKSHIRE's IP address 216.9.178.191 in Arizona queried Subject Parcel 6 and confirmed it had been delivered in their database. At approximately 10:55 a.m. case agents observed a black female, later identified as Brittany BREWER (DOB XX/XX/1991), exit the front door of XX16 North 14<sup>th</sup> Street, Milwaukee, Wisconsin. BREWER was speaking to someone on her cell phone and appeared to be looking for Subject Parcel 6. BREWER checked all sides of the porch and the grass area around the porch before going back inside the residence.

48. At approximately 10:58 a.m. BREWER walked across the street and checked the porch across from XX16 North 14<sup>th</sup> Street, Milwaukee, Wisconsin. She walked back across the street and into XX6 North 14<sup>th</sup> Street, Milwaukee, Wisconsin again.

49. At approximately 11:00 a.m. BREWER exited the front door and was carrying a male toddler (Figure 14). She accessed a tan 2003 Honda Civic with Wisconsin license plate 302-ZCP. Case agents reviewed DOT records and determined the Honda is registered to Sinclair Brewer (DOB XX/XX.1956) of XX29 North 41<sup>st</sup> Street Milwaukee, Wisconsin. Case agents followed BREWER to the area of North 15<sup>th</sup> Street and West Hauser Avenue, Milwaukee, WI. There BREWER pulled up to and met with the USPS carrier. After a brief conversation BREWER returned to XX16 North 14<sup>th</sup> Street, Milwaukee, Wisconsin and the USPS Post Office truck followed her to the address, where they again spoke. A short time later the USPS Delivery Truck departed the area and BREWER went back into the residence.



(Figure 14)

50. USPIS later obtained a recorded call placed on December 5, 2022, where a female identified herself as "Courtney." Subject Parcel 6 was being mailed to "Courtney Adams." The female caller filed a complaint regarding Subject Parcel 6, which case agents knew contained the fentanyl/fraudulent Oxycodone. This female called advised that she confronted the carrier about the missing parcel and said that he denied delivering Subject Parcel 6. The female caller stated she did not observe him deliver a parcel while on her porch. Case agents know from surveillance and the investigation, this was the interaction BREWER had with the carrier, which is consistent with the female caller being BREWER.

51. USPIS obtained video surveillance from the Phoenix, Arizona Post Office from November 30, 2022, from when Subject Parcel 6 was mailed to Milwaukee, Wisconsin. The video surveillance depicted BROOKSHIRE mailing Subject Parcel 6 (Figure 15).



(Figure 15)

**g. Subject Parcel 7 and Subject Parcel 8**

52. Prior to this surveillance case agents obtained records from WE Energies. Those records indicated that a BREWER has an open and active account at the address of XX16 North 14<sup>th</sup> Street, Milwaukee, Wisconsin since May 4, 2021, and a telephone number of 414-303-9944 is associated with the account. Case agents review a law enforcement database which indicated between February 12, 2019, and February 19, 2020, BREWER has a prior address of XX221 North 51<sup>st</sup> Avenue, Apt 2171, GLENDALE, AZ 85306-2555, in Maricopa County.

53. As part of the investigation into the DTO, case agents reviewed USPS databases which indicated BREWER called a USPS customer service on June 21, 2021, for parcel tracking number EJ805943480US (Subject Parcel 7). At the time of the inquiry, BREWER provided telephone number 414-737-1911 and email brittanybrewer0522@icloud.com.

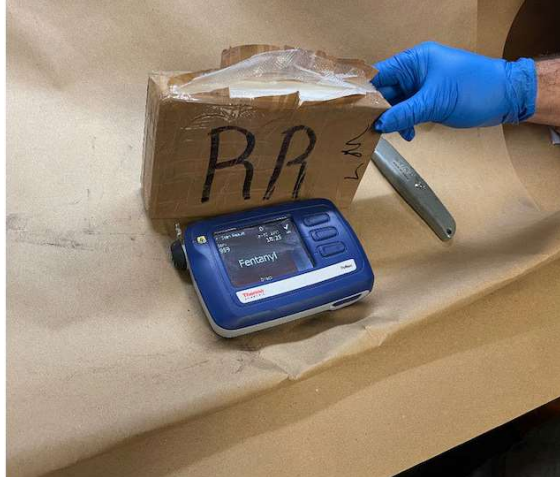
54. Subject Parcel 7 was mailed from XX820 North 44<sup>th</sup> Street, Apt 1239, Phoenix, AZ 85044, the same senders address for Subject Parcels 3 and 6, all with different apartment numbers. Further Subject Parcel 7 was being mailed to XX16 North 14<sup>th</sup> Street, Milwaukee, Wisconsin, the same receiving address for Subject Parcels 1, 3 and 6. Subject Parcel 7 weighed five ounces and

entered the mail stream in Tempe, Arizona. This same return address, XX820 North 44<sup>th</sup> Street, Phoenix, AZ 85044, was also used with another parcel with tracking number 9505510579162251361643 (Subject Parcel 8), going to a target address at XX50A North 28<sup>th</sup> Street, Milwaukee, Wisconsin on September 8, 2022. BROOKSHIRE's IP address of 216.9.178.191 was used to query the mailing status of Subject Parcel 8.

**h. Subject Parcel 9**

55. On December 29, 2022, case agents were contacted by USPIS regarding information obtained that BROOKSHIRE's IP address of 216.9.178.191 was used to track another parcel with tracking number 9505512594732362668035 (Subject Parcel 9). Subject Parcel 9 was mailed from Mesa, Arizona and was being sent to "Michelle Donley" at XX19 West Silver Spring Drive, Apt 101, Milwaukee, WI 53218.

56. On January 3, 2023, Magistrate Judge Nancy Joseph authorized a federal search warrant of Subject Parcel 9. Case agents executed the search warrant and inside Subject Parcel 9 was a kilogram of fentanyl, having the same "RR" marking on the packaging as Subject Parcel 2 and Subject Parcel 5 (Figure 16). USPIS used the "TruNarc" narcotics testing device on the white substance from Subject Parcel 9, which indicated the substance as being fentanyl and weighed with the result of approximately one kilogram. Case agents learned that BROOKSHIRE's IP address of 216.9.178.191 was used to track the movements of Subject Parcel 9 after it was seized also.



(Figure 16)

## B. Summary of the BROOKSHIRE DTO's Parcels

57. Based on the investigation into the DTO, case agents reviewed USPS databases regarding parcels connected the BROOKSHIRE DTO. Case agents located the 15 parcels in which BROOKSHIRE's IP address of 216.9.178.191 was used to query the mailing status between August 13, 2022, and December 28, 2022:

Dates Mailed	Tracking Number	Delivery Address
August 13, 2022	EI100996433US	XX25 North 91 <sup>st</sup> Street, Milwaukee, WI 53222
August 23, 2022	9505526557112235453412	XX50A North 28 <sup>th</sup> Street, Milwaukee, WI 53216
August 31, 2022	EI064850773US	XX33 East Pleasant Street, APT 207, Milwaukee, WI 53202
September 6, 2022	EI064851442US	XX16 North 14 <sup>th</sup> Street, Milwaukee, WI 53209
September 8, 2022	9505510579162251361643	XX50A North 28 <sup>th</sup> Street, Milwaukee, WI 53216 (Subject Parcel 8)
September 15, 2022	EI387224872US	XX16 North 14 <sup>th</sup> Street, Milwaukee, WI 53209 (Subject Parcel 1)
September 23, 2022	I361764274US	XX16 North 14 <sup>th</sup> Street, Milwaukee, WI 53209
September 28, 2022	9505511037712271424604	XX50A North 28 <sup>th</sup> Street, Milwaukee, WI 53216 (Subject Parcel 2)
October 4, 2022	EI431468528US	XX25 North 91 <sup>st</sup> Street, Milwaukee, WI 53222
October 12, 2022	9570110579172285481848	XX16 North 14 <sup>th</sup> Street, Milwaukee, WI 53209 (Subject Parcel 3)
October 14, 2022	9570113639812287174011	XX33 East Pleasant Street, APT 207, Milwaukee, WI 53202 (Subject Parcel 4)
November 10, 2022	9505512691532314019722	XX16 North 14 <sup>th</sup> Street, Milwaukee, WI 53209
November 19, 2022	9505512593972323384104	XX17 North 14 <sup>th</sup> Street, Milwaukee, WI 53209
November 30, 2022	9505510579162334370753	XX16 North 14 <sup>th</sup> Street, Milwaukee, WI 53209 (Subject Parcel 6)
December 28, 2022	9505512594732362668035	XX19 West Silver Spring Drive, Apt 101, Milwaukee, WI 53218 (Subject Parcel 9)

58. Case agents also located the two parcels in which 3218 West Oriole Drive Milwaukee, WI 53209-4127 IP address of 108.76.222.210 (Wi-Fi) was used during the mailing:

<b>Dates Mailed</b>	<b>Tracking Number</b>	<b>Delivery Address</b>
September 28, 2022	9505511037712271424604	XX50A North 28 <sup>th</sup> Street, Milwaukee, WI 53216 (Subject Parcel 2)
October 27, 2022	9505512141272300655939	X48 North 28 <sup>th</sup> Street, Milwaukee, WI 53208 (Subject Parcel 5)

59. Case agents also located the five parcels in which 3218 West Oriole Drive Milwaukee, WI 53209-4127 IP address of 2600.1700:b0d0:2e90: (Wired) was used during the mailing:

<b>Dates Mailed</b>	<b>Tracking Number</b>	<b>Delivery Address</b>
August 4, 2022	9505512141272216636947	XX50A North 28 <sup>th</sup> Street, Milwaukee, WI 53216
September 22, 2022	9505511805122265604456	XX00 West Appleton Avenue, Apt 7 Milwaukee, WI 53225
September 28, 2022	9505511037712271424604	XX50A North 28 <sup>th</sup> Street, Milwaukee, WI 53216 (Subject Parcel 2)
October 14, 2022	9570113639812287174011	XX33 East Pleasant Street, APT 207, Milwaukee, WI 53202 (Subject Parcel 4)
October 27, 2022	9505512141272300655939	X48 North 28 <sup>th</sup> Street, Milwaukee, WI 53208 (Subject Parcel 5)

60. Following the identification of the above listed parcels associated with BROOKSHIRE's IP address of 216.9.178.191 and 3218 West Oriole Drive Milwaukee, WI 53209-4127 IP address of 108.76.222.210 (Wi-Fi) and 2600.1700:b0d0:2e90: (Wired), case agents reviewed additional USPS database. Case agents determined the BROOKSHIRE DTO sent the first parcel consistent with Postal-based drug trafficking on November 8, 2021, to XX50A North 28<sup>th</sup> Street, Milwaukee, WI 53216. Case agents were able to connect the following addresses to parcels consistent with Postal based drug trafficking being received from the BROOKSHIRE DTO:

<b>Address</b>	<b>Subject Parcels Received</b>	<b>Parcels</b>
XX33 East Pleasant Street, APT 207, Milwaukee, WI 53202	Subject Parcel 4	7
XX50A North 28 <sup>th</sup> Street, Milwaukee, WI 53216	Subject Parcels 2 and 8	5



3954 North 24 <sup>th</sup> Place, Milwaukee, WI 53206		6
XX25 North 91 <sup>st</sup> Street, Milwaukee, WI 53222		2
XX16 North 14 <sup>th</sup> Street, Milwaukee, WI 53209	Subject Parcels 1, 3, 6, and 7	8
X48 North 28 <sup>th</sup> Street, Milwaukee, WI 53208	Subject Parcel 5	1
XX19 West Silver Spring Drive, Apt 101, Milwaukee, WI 53218	Subject Parcel 9	3
XX00 West Appleton Avenue, Apt 7 Milwaukee, WI 53225		2
		<b>Total: 34</b>

### C. BROOKSHIRE's Arizona Addresses

61. Case agents have been in contact with Detective Jose Angulo of the Chandler Police Department in Arizona regarding the BROOKSHIRE DTO. On October 15, 2022, Detective Angulo checked the address of XX571 West Courtney Drive, Maricopa, Arizona 85138, which case agents determined was associated with BROOKSHIRE from review of law enforcement databases. Detective Angulo observed a grey 2010 Honda Odyssey with Arizona license plate 1SA8SH registered to Laura Mae CASTANEDA (DOB XX/XX/1985) of XX571 West Courtney Drive, Maricopa, Arizona. Also, Detective Angulo observed a blue 2016 Kia Sportage with Arizona license plate DSA8B1A registered to Michael Anthony BENAVIDEZ (DOB XX/XX/198) of XX991 West Southampton Road, Surprise, Arizona 85374 parked in the driveway of XX571 West Courtney Drive, Maricopa, Arizona. Detective Angulo provided an Arizona DOT photograph of Laura Mae CASTANEDA. Laura Mae CASTANEDA resembled the Hispanic female (from Figure 5) who was present at the Arizona Post Office when Subject Parcel 2, the kilogram of fentanyl, was mailed.

62. Also on October 15, 2022, Detective Angulo also checked the address of XX254 West Cowpath Road, Maricopa, Arizona 85138, the location of IP address 216.9.178.191 used to track Subject Parcel 1, Subject Parcel 2, Subject Parcel 3, Subject Parcel 4, Subject Parcel 6, Subject Parcel 8 and other USPS parcels not intercepted/surveilled by law enforcement. Detective



Angulo observed a white Infiniti SUV with no front plate backed in the driveway. Detective Angulo also observed a black 2007 Lexus ES 4DR bearing Arizona license plate VWA4ZK (Lexus) parked in front of the residence at XX254 West Cowpath Road, Maricopa, Arizona. The Lexus was registered to Leonard V. BROOKSHIRE (DOB XX/XX/1978) of XX254 West Cowpath Road, Maricopa, Arizona.

63. Case agents know from USPS video surveillance in Laveen, Arizona that BROOKSHIRE used a black Lexus 4DR to drive the USPS and mail Subject Parcel 1 to XX16 North 14<sup>th</sup> Street Milwaukee, WI. Subject Parcel 1 that was ultimately picked up at XX16 North 14<sup>th</sup> Street Milwaukee, Wisconsin by CRAWFORD.

64. Detective Angulo also identified April L. JOHNSON (DOB XX/XX/1979) of XX515 West Bravo Driver, Maricopa, Arizona as being associated with the address of XX254 West Cowpath Road, Maricopa, Arizona. Case agents were aware from law enforcement databases that April JOHNSON is the mother of BROOKSHIRE's child/children and JOHNSON's family resides in Milwaukee, Wisconsin.

#### **D. Identification and Surveillance of 3218 West Oriole Drive Milwaukee, WI 53209**

65. On November 28, 2022, case agents obtained a subpoena for AT&T regarding the records related to IP address 108.76.222.210, which was used to track Subject Parcel 5 and 2600.1700:b0d0:2e90:, which was used to track to Subject Parcels 4 and 5. AT&T provided that ID address 108.76.222.210 was related to a Wi-Fi connection and 2600.1700:b0d0:2e90: was an IP address for a device connected through hard wired internet connection. AT&T provided the subscriber for both 108.76.222.210 (AT&T IPV4 Wi-Fi) and 2600.1700:b0d0:2e90: (AT&T IPV6 Wired) as Tensie JACKSON of 3218 West Oriole Drive Milwaukee, WI 53209-4127, with account number 113972554. Tensie JACKSON account was created on October 4, 2011, and has a

member ID as tjackson9804@att.net and listed email TJACKSON9804@ATT.NET. USPS databases show IP address 108.76.222.210 was related to a Wi-Fi connection and 2600.1700:b0d0:2e90: was related to a wired connection.

66. Case agents reviewed WE Energies records for 3218 West Oriole Drive, Milwaukee, WI and there is an account registered to Luis ALEXANDER since March 8, 1990. Case agents reviewed law enforcement databases which indicated Jerry W ALEXANDER (DOB XX/XX/1971) and Jeremy W. ALEXANDER (DOB XX/XX/1998) are also associated with the address of 3218 West Oriole Drive, Milwaukee, WI.

67. On December 2, 2022, case agents were conducting surveillance at 3218 West Oriole Drive, Milwaukee, Wisconsin where the AT&T IP address 108.76.222.210 (AT&T IPV4 Wi-Fi) and 2600.1700:b0d0:2e90: (AT&T IPV6 Wired) is registered and was being used to track the BROOKSHIRE DTO Subject Parcels 2, 4 and 5.

68. While conducting surveillance on December 2, 2022, at 3218 West Oriole Drive, Milwaukee, Wisconsin, case agents observed a dark blue 2005 Acura TL with Wisconsin license plate ARX-5650, which is registered to Wonderboys LLC. Case agents conducted an open social media search the Wonderboys LLC and found it is a Wisconsin Domestic Limited-Liability company filed on May 24, 2022. The listed address for Wonderboys LLC is 3218 West Oriole Drive, Milwaukee, Wisconsin. Case agents also located on a law enforcement database that Zheniah JACKSON and Jerry ALEXANDER are associated with Wonderboys LLC.

69. During surveillance on December 2, 2022, case agents observed a woman, identified as Tensie JACKSON by case agents, exit the front door and throw a bag into the garbage. Case agents also observed a brown 2003 Chevrolet Impala with Wisconsin license plate ANF-3605 parked in the driveway. Case agents reviewed records and determined the Impala is

registered to Tensie JACKSON (DOB XX/XX/1969) of 3218 West Oriole Drive, Milwaukee, Wisconsin.

70. On December 26, 2022, at approximately 10:45 a.m. case agents were conducting surveillance at 3218 West Oriole Drive, Milwaukee, Wisconsin where IP address 108.76.222.210 (AT&T IPV4 Wi-Fi) and 2600.1700:b0d0:2e90: (AT&T IPV6 Wired) is registered to Tensie JACKSON. Case agents observed parked in the driveway the dark blue 2005 Acura TL with Wisconsin license plate ARX-5650, registered to Wonderboys LLC, which has a registered agent of Zheniah JACKSON, that was also observed on December 2, 2022, at 3218 West Oriole Drive, Milwaukee, Wisconsin. Also parked in the driveway case agents observed a black 2017 Volkswagen Sedan with Wisconsin license plate ARE-7442. Case agents reviewed DOT records, which indicated the Volkswagen was registered to Zheniah L. JACKSON (DOB XX/XX/1998) of 3218 West Oriole Drive, Milwaukee, Wisconsin. Case agents also observed Tensie JACKSON's brown 2003 Chevrolet Impala with Wisconsin license plate ANF-3605 in the driveway. Case agents also observed a Gray Nissan Rogue with Wisconsin Brewer license plate MENMY2. Case agents reviewed DOT record, which indicted the Rogue was also registered to Tensie R. JACKSON (DOB XX/XX/1969) of 3218 West Oriole Drive, Milwaukee, Wisconsin.

71. At approximately 10:50 a.m. case agents observed Tensie JACKSON and Jeremiah Z. JACKSON (DOB XX/XX/2004), exit the front door of 3218 West Oriole Drive, Milwaukee, Wisconsin. Jeremiah JACKSON was identified through DTO photos and was determined to be the brother of Zheniah JACKSON after a review of law enforcement databased. Jeremiah JACKSON started and moved the black 2017 Volkswagen Sedan with Wisconsin license plate ARE-7442 out of the driveway and parked it onto the street. Both Jeremiah JACKSON and Tensie JACKSON entered the brown 2003 Chevrolet Impala with Wisconsin license plate ANF-3605. Jeremiah

JACKSON was driving the Impala. Jeremiah JACKSON and Tensie JACKSON then departed the area. Case agents followed the brown 2003 Chevrolet Impala to the Pick-n-Save at 1735 West Silver Spring Drive, Glendale, Wisconsin where both Tensie JACKSON and Jeremiah JACKSON were observed coming and going from the Pick-n-Save.

**E. Arrest of BROOKSHIRE, ECHOLS and BREWER**

**a. Arrest of BROOKSHIRE**

72. On January 11, 2023, members of the Chandler Arizona SWAT/Narcotics Investigations executed a State of Arizona search warrant at the residence of XX254 West Cowpath Maricopa, AZ and arrested BROOKSHIRE on his Federal Arrest Warrant from the Eastern District of Wisconsin. During the search of BROOKSHIRE's residence, law enforcement located two firearms (an assault rifle and "Ghost" handgun), small amount of cocaine and marijuana, a dark black Samsung cell phone on top of a night stand (Device A), a black Nokia flip style cell phone in drawer of night stand (Device B) and a Motorola cell phone with cracked screen on top of night stand (Device C), IP router and other evidence linked to this on-going investigation was collected of evidence.

73. BROOKSHIRE waived his Miranda and Corley rights and provided a statement. BROOKSHIRE advised that he had two firearms inside the residence, which belonged to him. BROOKSHIRE admitted that he is a convicted felon and prohibited from possessing firearms. BROOKSHIRE also admitted to having some marijuana and cocaine at this residence.

74. BROOKSHIRE admitted to sending USPS parcels from Arizona to Milwaukee, Wisconsin. BROOKSHIRE initially denied knowing the contents of the parcels. BROOKSHIRE admitted to sending Subject Parcel 2 to his associate Kevin PULLEY and Subject Parcel 4 to his associate Jacque HERNANDEZ. BROOKSHIRE advised that he was involved in the distribution

of marijuana and later admitted that he was aware that the parcels he was sending to Milwaukee, Wisconsin was not marijuana and suspected to be fentanyl.

75. BROOKSHIRE advised that Device B was used to speak and coordinate the shipments of USPS parcels from Arizona to Milwaukee, Wisconsin. BROOKSHIRE advised that Device B was used to speak directly to BROOKSHIRE's Source of Supply in Mexico. BROOKSHIRE advised that he had been sending USPS parcels from Arizona to Milwaukee, Wisconsin for the past eight to twelve months. BROOKSHIRE explained that he not only sent USPS parcels for the Source of Supply in Mexico but used his IP wireless internet and Device A and/or Device C to track the shipments of USPS parcels sent by others to Milwaukee, Wisconsin. BROOKSHIRE did not identify whom in Arizona coordinated the contact between him and the Source of Supply in Mexico. BROOKSHIRE also did not provide consent to search Device A, Device B or Device C.

76. BROOKSHIRE identified Jacque HERNANDEZ, Kevin PULLEY, James CRAWFORD as "Bud", Daneeka HENNINGS, Jerry ALEXANDER as "Will", Justin BROOKSHIRE-CAIN as "his cousin" and Shainya BROOKSHIRE as "his sister". BROOKSHIRE advised that he was paid between \$800 and \$1,000 to send the USPS parcels from Arizona to Milwaukee, Wisconsin and paid the recipients in Milwaukee, Wisconsin a few hundred dollars for each USPS parcel. BROOKSHIRE was later transported to the Core Civic Facility is 1155 N Pinal Parkway, Florence, AZ 85132.

77. Device A, Device B and Device C were initially placed on Chandler Police Department evidence, transferred to my custody. I transferred Devices A, Device B and Device C onto West Allis Police Department Inventory No. 23-000217, Item No. 1, No. 23-000217, Item

No. 2, No. 23-000217, Item No. 3 at the West Allis Police Department, located at 11301 West Lincoln Avenue, West Allis, Wisconsin.

**b. Arrest of ECHOLS**

78. On January 11, 2023, Yvonne ECHOLS was arrested on a federal arrest warrant as she left the residence of XX19 North 54<sup>th</sup> Street, Milwaukee, Wisconsin. ECHOLS inside her vehicle at the time and in possession of a green Apple I Phone with pink protective case (Device D). ECHOLS refused to provide a statement to the arresting agents and was transported the United States Marshal Service on her outstanding warrant.

79. Device D was placed on Milwaukee Police Department Inventory No. 23001793, Item No. 2 and secured at the HIDTA office, located at 801 West Michigan Street, Milwaukee, Wisconsin.

**c. Arrest of BREWER**

80. On January 13, 2023, at approximately 7:15 a.m., case agents were conducting surveillance at Brittany BREWER's known residence of XX16 North 14th Street, Milwaukee, Wisconsin. Case agents observed a vehicle with Wisconsin license plate 302-ZCP parked in front of the residence. At approximately 7:38 a.m. BREWER exited the residence with two children and left. Case agents conducted a traffic stop on the vehicle in the 3800 block of North 21<sup>st</sup> Street Milwaukee, Wisconsin where BREWER was subsequently taken into custody for the federal arrest warrant. During a search of BREWER, case agents located an Apple I Phone with diamond studded protective case (Device E), which was taken as evidence. BREWER was transported to the West Allis Police Department.

81. BREWER waived her Miranda rights and provided a custodial interview. BREWER admitted to receiving USPS parcels from Arizona and allowed someone to use her

address in Milwaukee, Wisconsin for the parcels. BREWERS would not provide the identify of this person. BREWER denied having knowledge what the USPS parcels contained. She admitted to looking for Subject Parcel 6 on her porch at XX16 North 14<sup>th</sup> Street, Milwaukee, Wisconsin and calling the USPS and providing a fictitious name in an attempt to locate Subject Parcel 6. Brittany BREWER denied knowing BROOKSHIRE and denied having knowledge of Jamesha CRAWFORD receiving USPS parcels from her residence. She did recognize Jamesha CRAWFORD but did not explain how she knew her. BREWER requested an attorney once case agents again asked about the identify of who was sending her the USPS parcels. Brittany BREWER would not provide consent to search Device E.

82. Device E was placed onto West Allis Police Department Inventory No. 23-000219, Item No. 1 at the West Allis Police Department, located at 11301 West Lincoln Avenue, West Allis, Wisconsin.

83. The Devices are currently in the lawful possession of the Drug Enforcement Administration. The Devices came into the DEA's possession in the following way: search incident to arrest. Therefore, while the DEA might already have all necessary authority to examine the Devices, I seek this additional warrant out of an abundance of caution to be certain that an examination of the Devices will comply with the Fourth Amendment and other applicable laws.

84. The Devices are currently in storage at the West Allis Police Department, located at 11301 W. Lincoln Ave. West Allis, Wisconsin and at the Milwaukee High Intensity Drug Trafficking Area (HIDTA), located at 801 West Michigan Street, Milwaukee, Wisconsin. In my training and experience, I know that the Devices have been stored in a manner in which its contents are, to the extent material to this investigation, in substantially the same state as they were when the Devices first came into the possession of the DEA.

#### **IV. TECHNICAL TERMS**

85. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a. Wireless telephone:** A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional “land line” telephones. A wireless telephone usually contains a “call log,” which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include storing names and phone numbers in electronic “address books;” sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system (“GPS”) technology for determining the location of the device.
- b. Digital camera:** A digital camera is a camera that records pictures as digital picture files, rather than by using photographic film. Digital cameras use a variety of fixed and removable storage media to store their recorded images. Images can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard drives. Most digital cameras



also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.

- c. GPS: A GPS navigation device uses the Global Positioning System to display its current location. It often contains records the locations where it has been. Some GPS navigation devices can give a user driving or walking directions to another location. These devices can contain records of the addresses or locations involved in such navigation. The Global Positioning System (generally abbreviated “GPS”) consists of 24 NAVSTAR satellites orbiting the Earth. Each satellite contains an extremely accurate clock. Each satellite repeatedly transmits by radio a mathematical representation of the current time, combined with a special sequence of numbers. These signals are sent by radio, using specifications that are publicly available. A GPS antenna on Earth can receive those signals. When a GPS antenna receives signals from at least four satellites, a computer connected to that antenna can mathematically calculate the antenna’s latitude, longitude, and sometimes altitude with a high level of precision.
- d. IP Address: An Internet Protocol address (or simply “IP address”) is a unique numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP

addresses, while other computers have dynamic—that is, frequently changed—IP addresses.

- e. Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

86. Based on my training, experience, and research, I know that the Devices have capabilities that allow it to serve as a wireless telephone, digital camera and video recorder, portable media player, internet web browser, and GPS navigation device. In my training and experience, examining data stored on devices of this type can uncover, among other things, evidence that reveals or suggests who possessed or used the device.

## **V. ELECTRONIC STORAGE AND FORENSIC ANALYSIS**

87. Based on my knowledge, training, and experience, I know that electronic devices can store information for long periods of time. Similarly, things that have been viewed via the Internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools.

88. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the Devices was used, the purpose of its use, who used it, and when. There is probable cause to believe that this forensic electronic evidence might be on the Devices because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a

file (such as a paragraph that has been deleted from a word processing file). Virtual memory paging systems can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, e-mail programs, and chat programs store configuration information on the storage medium that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the computer was in use. Computer file systems can record information about the dates files were created and the sequence in which they were created.

- b.** Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.
- c.** A person with appropriate familiarity with how an electronic device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how electronic devices were used, the purpose of their use, who used them, and when.
- d.** The process of identifying the exact electronically stored information on a storage medium that is necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual

information necessary to understand other evidence also falls within the scope of the warrant.

- e. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

89. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the examination of the Devices consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

90. *Manner of execution.* Because this warrant seeks only permission to examine the Device already in law enforcement's possession, the execution of this warrant does not involve the physical intrusion onto a premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

## **VI. CONCLUSION**

91. Based on the above information provided in this affidavit, I believe there is probable cause that the Devices contain evidence of Conspiracy to Distribute and Conspiracy to Possess with Intent to Distribute, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance, in violation of Title 21, United States Code Sections 843(b), committed by Leonard BROOKSHIRE (DOB XX/XX/1978), Yvonne M. ECHOLS (DOB XX/XX/1979) and Brittany BREWER (DOB XX/XX/1991), and other unknown suspects.

**ATTACHMENT A**  
**Property to Be Searched**

1. The property to be searched are the five cellular phones, more fully described as the following, hereinafter referred as the “Devices”:

- a. a dark black Samsung located cell phone located on January 11, 2023, on top of a nightstand at BROOKSHIRE’s residence of XX254 West Cowpath, Maricopa, AZ, in evidence under West Allis Police Department Inventory No. 23-000217, Item No. 1 (“Device A”);
- b. a black Nokia flip style cell phone located on January 11, 2023, in the drawer of a nightstand at BROOKSHIRE’s residence of XX254 West Cowpath, Maricopa, AZ, currently in evidence under West Allis Police Department Inventory No. 23-000217, Item No. 2 (“Device B”);
- c. a Motorola cell phone with cracked screen located on January 11, 2023, on top of a nightstand at BROOKSHIRE’s residence of XX254 West Cowpath, Maricopa, AZ, in evidence under West Allis Police Department Inventory No. 23-000217, Item No. 3 (“Device C”);
- d. a green Apple I Phone with pink protective case located on January 11, 2023, during the arrest of Brittany Brewer, currently in evidence under Milwaukee Police Department Inventory No. 23001793, Item No. 2 (“Device D”); and
- e. an Apple I Phone with diamond studded protective case, located on January 13, 2023, during the arrest of BREWER, currently in evidence under West Allis Police Department Inventory No. 23-000219, Item No. 1 (“Device E”).

2. Device A, Device B, Device C, and Device E are currently stored at the West Allis Police Department, located at 11301 West Lincoln Avenue, West Allis, Wisconsin and Device D is currently stored at the HIDTA office, located at 801 West Michigan Street, Milwaukee, Wisconsin.

3. The applied-for warrant would authorize the forensic examination of the Devices for the purpose of identifying electronically stored data particularly described in Attachment B.

**ATTACHMENT B**  
**Particular Things to be Seized**

1 All records and information on the Devices described in Attachment A that relate to a violation of Conspiracy to Distribute and Conspiracy to Possess with Intent to Distribute, in violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance, in violation of Title 21, United States Code Sections 843(b), including:

- a. Preparatory steps taken in furtherance of this crime;
  - b. Any audio, video, and/or photograph(s) files on the phone of criminal activity or of evidentiary value;
  - c. All voicemail and call records;
  - d. All text messages and call history;
  - e. Contact list, to include names, addresses, phone numbers, and/or email addresses;
  - f. All social media sites used and applications for social media sites;
  - g. All internet activity;
  - h. All location data including from the phone and/or from any downloaded applications;
2. Evidence of user attribution showing who used or owned the Devices at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history;
3. Records evidencing the use of the Internet Protocol address to communicate, including:
- a. records of Internet Protocol addresses used;

- b. records of Internet activity, including firewall logs, caches, browser history and cookies, “bookmarked” or “favorite” web pages, search terms that the user entered into any Internet search engine, and records of user-typed web addresses.

As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.